

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GENOA COLOR TECHNOLOGIES, LTD.,

Plaintiff,

v.

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MITSUBISHI ELECTRIC CORP.; MITSUBISHI
ELECTRIC US HOLDINGS, INC.; MITSUBISHI
ELECTRIC AND ELECTRONICS USA, INC.;
MITSUBISHI DIGITAL ELECTRONICS AMERICA, INC.;
SAMSUNG ELECTRONICS CO., LTD.; SAMSUNG
ELECTRONICS AMERICA, INC.,

Defendants.

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No. 07 CIV 6233 (PKC)

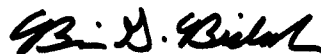
ECF Case

**NOTICE OF MOTION TO
ADMIT COUNSEL *PRO
HAC VICE***

PLEASE TAKE NOTICE that, upon the annexed declarations of Brian G.

Bieluch and Richard J. Johnson, and the exhibits attached thereto, and with the consent of
counsel for Plaintiff Genoa Color Technologies, Ltd. and counsel for the Mitsubishi Defendants,
Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., by and
through their undersigned counsel, will move this Court, as soon as counsel may be heard, for an
Order pursuant to Local Civil Rule 1.3(c) of this Court admitting Richard J. Johnson *pro hac vice*
in connection with the above-captioned action, and for such other and further relief as the Court
may deem just and proper.

COVINGTON & BURLING LLP



Brian G. Bieluch
Covington & Burling LLP
1201 Pennsylvania Avenue, NW
Washington, DC 20004
(202) 662-6000

Dated: Washington, DC
June 6, 2008

*Attorneys for Defendants Samsung Electronics
Co., Ltd. and Samsung Electronics America,
Inc.*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GENOA COLOR TECHNOLOGIES, LTD.,

Plaintiff,

v.

MITSUBISHI ELECTRIC CORP.; MITSUBISHI
ELECTRIC US HOLDINGS, INC.; MITSUBISHI
ELECTRIC AND ELECTRONICS USA, INC.;
MITSUBISHI DIGITAL ELECTRONICS AMERICA, INC.;
SAMSUNG ELECTRONICS CO., LTD.; SAMSUNG
ELECTRONICS AMERICA, INC.,

Defendants.
----- x

No. 07 CIV 6233 (PKC)

ECF Case

**DECLARATION OF
BRIAN G. BIELUCH**

Pursuant to 28 U.S.C. § 1746, I, Brian G. Bieluch, declare:

1. I am an attorney with the law firm of Covington & Burling LLP, attorneys for Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. in the above-captioned matter. I was admitted to practice before the United States District Court for the Southern District of New York on October 23, 2007 and remain in good standing therein. I submit this declaration in support of Defendants' Motion to Admit Counsel *Pro Hac Vice* in connection with this action pursuant to Local Civil Rule 1.3(c).


2. By reputation and experience, I know Mr. Johnson to be an attorney of good character, competence, and experience. I am confident that he will conduct himself accordingly before this Court.

3. In connection with this application, I am submitting a declaration of Mr. Johnson in which he describes his experience and familiarity with the Judicial Code governing practice in the United States District Courts, Federal Rules of Civil Procedure, Federal Rules of Criminal Procedure, Federal Rules of Evidence, and Local Rules governing practice in this Court. Attached to the declaration as exhibits are Certificates of Good Standing issued within the last thirty days from the state bars in which Mr. Johnson is admitted.

4. For the foregoing reasons, I respectfully request that Defendants' motion be granted. For the Court's convenience, a proposed order granting the motion to admit Counsel *pro hac vice* is annexed hereto as Exhibit A.

5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 5, 2008, in Washington, DC:


Brian G. Bieluch

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GENOA COLOR TECHNOLOGIES, LTD.,	:	
	:	
Plaintiff,	:	No. 07 CIV 6233 (PKC)
	:	
v.	:	ECF Case
	:	
MITSUBISHI ELECTRIC CORP.; MITSUBISHI	:	
ELECTRIC US HOLDINGS, INC.; MITSUBISHI	:	ORDER ADMITTING
ELECTRIC AND ELECTRONICS USA, INC.;	:	COUNSEL <i>PRO HAC</i>
MITSUBISHI DIGITAL ELECTRONICS AMERICA, INC.;	:	<i>VICE</i>
SAMSUNG ELECTRONICS CO., LTD.; SAMSUNG	:	
ELECTRONICS AMERICA, INC.,	:	
	:	
Defendants.	:	
-----	x	

This matter having been brought before the Court by Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., through its counsel Covington and Burling LLP, by motion pursuant to Local Civil Rule 1.3(c) for an order admitting Richard J. Johnson *pro hac vice*, on notice to all parties of record hereto, and the Court having reviewed and considered the papers filed in support of this Motion, it is hereby

ORDERED that Richard J. Johnson be and hereby is admitted *pro hac vice* in connection with this action and shall abide by the provisions of the Local Rules of this Court in all respects and be subject to the disciplinary jurisdiction of the Court in accordance with Local Civil Rule 1.5.

SO ORDERED:

_____	Date: _____
U.S.D.J.	

CERTIFICATE OF SERVICE

I hereby certify that on June 6, 2008, I caused true and exact copies of the foregoing (1) Notice of Motion to Admit Counsel *Pro Hac Vice* dated June 6, 2008; (2) Declaration of Brian G. Bieluch dated June 5, 2008 and the exhibit attached thereto; (3) Declaration of Richard J. Johnson dated June 5, 2008 and the exhibits attached thereto; and (4) proposed Order Admitting Counsel *Pro Hac Vice*, to be served by United States Mail, first class postage pre-paid, on the following attorneys of record to the within action (No. 07 CIV 06233 (PKC)):

Lee A. Goldberg
Nathaniel Buchek
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Brian G. Bieluch

Dated: June 6, 2008
Washington, DC